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File 21413

December 17, 2012

VIA COURIER and RESS FILING

Ms. Kirsten Walli Board Secretary Ontario Energy Board 2300 Yonge Street 27th Floor Toronto ON M4P 1E4

Dear Ms. Walli

Re: Notice of Application and Notice of Motions Horizon Utilities Corporation Application to amend licensed service area filed June 18, 2012 Board File No. EB-2012-0047

We are retained to act as counsel to Power Workers' Union.

By way of this letter, the Power Workers' Union ("PWU") is requesting Intervenor status in the Board's above-noted proceedings. This matter just recently came to my attention. I note that Procedural Order #1 did not contain a deadline for interventions. However, to the extent this is a late intervention request, the PWU seeks the Board's leave to do so.

The PWU represents the majority of the employees of Hydro One, including employees who would be involved (on behalf of Hydro One) in work in the service territory that is the subject of the application. As a result PWU members will be directly impacted by the application and its outcome.

More generally, the PWU represents a large portion of the employees working in Ontario's electricity industry and has utmost interest in regulatory proceedings that impact the provision of electricity service adequacy, reliability and safety to customers. Attached please find a list of PWU employers.

The PWU has retained Judy Kwik and Mr. Bayu Kidane of Elenchus Research Associates as consultants and Paliare Roland for legal representation in this proceeding. Please provide copies of all communications with regard to the PWU's participation to:

Ian J. Roland Ken Rosenberg Linda R. Rothstein Richard P. Stephenson Nick Coleman Margaret L. Waddell Donald K. Eady Gordon D. Capern Lily I. Harmer Andrew Lokan John Monger Odette Soriano Andrew C. Lewis Megan E. Shortreed Massimo Starnino Karen Jones Robert A. Centa Nini Jones Jeffrey Larry Kristian Borg-Olivier **Emily Lawrence** Denise Sayer Danny Kastner Tina H. Lie Jean-Claude Killey Jodi Martin Michael Fenrick Nasha Nijhawan Jessica Latimer Debra Newell Lindsay Scott Alysha Shore Gregory Ko

HONORARY COUNSEL

lan G. Scott, Q.C., O.C. (1934 - 2006) John Sprackett Staff Officer, President's Office Power Workers' Union 244 Eglinton Avenue East. Toronto, ON M4P 1K2 e-mail: <u>sprackettj@pwu.ca</u> Telephone: (416) 322-4787 Fax: 416-481-7914

And,

Judy Kwik Senior Consultant Elenchus Research Associates (ERA) 34 King Street East, Suite 610 Toronto, Ontario M5C 2X8 e-mail: jkwik@Elenchus.ca Telephone: 416-348-8777 Fax: 416-348-9930

And,

Mr. Bayu Kidane Consultant Elenchus Research Associates (ERA) 34 King Street East, Suite 610 Toronto, Ontario M5C 2X8 e-mail: <u>bkidane@Elenchus.ca</u> Telephone: 416-348-0666 Fax: 416-348-9930

And,

Richard Stephenson Counsel Paliare Roland 250 University Avenue, Suite 510 Toronto, Ontario M5H 3E5 e-mail: <u>Richard.Stephenson@paliareroland.com</u> Telephone: 416-646-4325 Fax: 416-646-4335 The PWU will not be seeking cost eligibility in these proceedings.

Yours very truly, PALIARE ROLAND ROSENBERG ROTHSTEIN LLP Richard P. Stephenson RPS:jr encl.

cc: Applicant and Intervenors (via email)

Horizon Utilities Corporation indy.butany@horizonutilities.com Dennis M. O'Leary doleary@airdberlis.com Hydro One Networks Inc. Andrew.skalski@hydroone.com Michael Engelberg mengelberg@HydroOne.com Multi-Area Development Inc. spicer@multi-area.com Peter Ruby pruby@goodmans.com School Energy Coalition wmcnally@opsba.org Jay Shepherd jay.shepherd@canadianenergylawyers.com

Doc 849751v1

List of PWU Employers

Algoma Power AMEC Nuclear Safety Solutions Atomic Energy of Canada Limited (Chalk River Laboratories) BPC District Energy Investments Limited Partnership Brant County Power Incorporated **Brighton Beach Power Limited** Brookfield Power - Mississagi Power Trust Bruce Power Inc. Atlantic Power - Calstock Power Plant Atlantic Power - Kapuskasing Power Plant Atlantic Power - Nipigon Power Plant Atlantic Power - Tunis Power Plant **Coor Nuclear Services** Corporation of the City of Dryden – Dryden Municipal Telephone Corporation of the County of Brant, The Coulter Water Meter Service Inc. **CRU Solutions Inc.** Ecaliber (Canada) **Erie Thames Services and Powerlines** ES Fox Great Lakes Power Limited Grimsby Power Incorporated Halton Hills Hydro Inc. Hydro One Inc. Independent Electricity System Operator Inergi LP Innisfil Hydro Distribution Systems Limited Kenora Hydro Electric Corporation Ltd. Kincardine Cable TV Ltd. Kinectrics Inc. Kitchener-Wilmot Hydro Inc. Lake Superior Power Inc. (A Brookfield Company) London Hvdro Corporation Middlesex Power Distribution Corporation Milton Hydro Distribution Inc. New Horizon System Solutions Newmarket Hydro Ltd. Norfolk Power Distribution Inc. Nuclear Waste Management Organization Ontario Power Generation Inc. Orangeville Hydro Limited Portlands Energy Centre PowerStream **PUC Services** Sioux Lookout Hydro Inc. Sodexho Canada Ltd. TransAlta Generation Partnership O.H.S.C. Vertex Customer Management (Canada) Limited Whitby Hydro Energy Services Corporation